

Candidate Privacy Notice

PURPOSE OF PROCESSING

- This Data Protection Notice (the “**Notice**”) aims to give individuals (including but not limited to individuals, contractors and/or consultants) (“**Candidates**”) applying for any vacancies at Outbrain Inc. or one of its group companies information as to how we may use your personal data (i.e. information that directly or indirectly identifies an individual) (“**Candidate Personal Data**”).
- The provision of Candidate Personal Data by Candidates is necessary in order for Outbrain to fulfil its legal and contractual obligations and where in the legitimate interests of Outbrain to manage the recruitment process.
- Outbrain is considered the data controller with respect to the Candidate Personal Data. Outbrain will process personal data including Candidate Personal Data in accordance with applicable privacy and data protection laws and regulations (“**Data Protection Requirements**”).

TYPES OF CANDIDATE PERSONAL DATA

- Outbrain may process the following types of Candidate Personal Data:
 - identification data (e.g. name, title);
 - personal contact details (e.g. mobile number, email and postal address);
 - date of birth;
 - current employment status and employment history including salary details;
 - right to work information (including passport and visa details);
 - background screening information (including criminal, credit reference and fraud checking); and
 - other information voluntarily disclosed by the Candidate (including sensitive personal data).
- Sensitive personal data (including, for example, information revealing an individual’s racial or ethnic origin, physical or mental health or sexual orientation and criminal records) are processed solely in accordance with applicable Data Protection Requirements and where



the processing is necessary for Outbrain to comply with employment law, with the explicit consent of the Candidate or where such processing is specifically authorised or required by law.

DISCLOSURE OF CANDIDATE PERSONAL DATA

- Candidate Personal Data may be disclosed to the following recipients, subject to any local Data Protection Requirements:
 - other entities in the Outbrain group;
 - other service providers (duly appointed as data processors) involved in the provision of services to Outbrain as part of its recruitment process;
 - local tax authorities and any governmental or administrative body where Outbrain determines that it is necessary or desirable in order to comply with applicable laws, court orders, or government regulations; and
 - a third party that is looking to acquire or does acquire all or part of the assets or stock of Outbrain, or that succeeds Outbrain in carrying on all or a part of the business of Outbrain whether by merger, acquisition, re-organisation or otherwise.

TRANSFERS OF CANDIDATE PERSONAL DATA

- Outbrain will, for the above listed purposes, transfer Candidate Personal Data to other Outbrain entities that are located in countries outside the European Economic Area (“EEA”) including the United States of America.
- Candidate Personal Data will only be transferred from the EEA to a recipient in a country which is not considered to provide an adequate level of data protection when the transfer is in compliance with applicable Data Protection Requirements.
- Outbrain has entered into EU Standard Contractual Clauses for controller to controller and controller to processor transfers of personal data, including Candidate Personal Data within the Outbrain group.

SECURING CANDIDATE PERSONAL DATA

- Candidate Personal data collected as part of Outbrain’s recruitment process will be retained in line with an active data retention policy. Personal data collected as part of

unsuccessful or abandoned applications will be retained for a period of up to 12 months after it was collected.

- Personal data belonging to Candidates who secure employment with Outbrain is retained for the periods mentioned in the data retention policy, which is available to Outbrain employees.
- Outbrain may hold Candidate Personal Data electronically and/or in hard copy form. Access to Candidate Personal Data is restricted to authorised Outbrain employees only who require access to Candidate Personal Data to allow them to perform their duties of employment.
- Outbrain will implement appropriate technical and organisational measures to protect Candidate Personal Data against loss or theft, as well as from accidental or unlawful destruction or alteration, unauthorised access or disclosure.

RIGHTS OF CANDIDATES

- Individuals have certain rights under Data Protection Requirements which may be subject to limitations and/or restrictions. These rights include the right to:
 - request access to and rectification or erasure of their Candidate Personal Data;
 - restrict processing or to object to processing of their Candidate Personal Data;
 - and
 - the right to data portability.
- It is every Candidate's responsibility to provide Outbrain with accurate Candidate Personal Data and to inform Outbrain of any changes.
- Candidates also have the right to lodge a complaint about the processing of their Candidate Personal Data with their local data protection authority.

ENQUIRIES

- In the first instance, all enquiries, requests or concerns regarding this Data Protection Notice or relating to the processing of Candidate Personal Data should be sent to legal@outbrain.com.
- If you are not satisfied with Outbrain's response, you also have the right to lodge a complaint about the processing of Your Personal Data with Your local data protection authority or with Outbrain's Data Protection Officer at privacy@eprivacy.eu.